

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ZOND, INC.,

Plaintiff,

v.

INTEL CORPORATION,

Defendant.

CIVIL ACTION NO. 1:13-cv-11570-RGS

**PLAINTIFF ZOND, INC.'S MOTION TO COMPEL SUPPLEMENTAL INITIAL
DISCLOSURES FROM DEFENDANT INTEL CORPORATION**

Plaintiff Zond, Inc. ("Zond") moves this court to compel Defendant Intel Corporation ("Intel") to supplement its initial disclosures served on October 24, 2013. Intel's initial disclosures are grossly deficient because Intel has not provided a single named Intel witness.

The grounds for Zond's motion are set forth in the accompanying Memorandum of Law.

LOCAL RULE 7.1 CERTIFICATE OF CONSULTATION

I, Tigran Vardanian, hereby certify that in accordance with Local Rule 7.1(a)(2), counsel for Plaintiff Zond, Inc. and counsel for Defendant Intel Corporation met and conferred regarding resolution of this motion via email on October 25, 2013, and as part of the parties' work on a joint Rule 26(f) Report, in a good faith effort to resolve or narrow the issues herein, but could not obtain agreement to the specific relief requested in this motion. Additional details of the parties' meet and confer efforts are provided in Section I of the Memorandum in support of this motion, being submitted herewith.

Dated: November 29, 2013

Respectfully submitted,

ZOND, INC.

By its counsel,

/s/ Tigran Vardanian

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on the above date.

/s/ Tigran Vardanian
Tigran Vardanian